

EXHIBIT E

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 -----)
5 IN RE: NATIONAL) MDL No. 2804
6 PRESCRIPTION OPIATE)
7 LITIGATION) Case No.
8 -----) 1:17-MD-2804
9)
10 THIS DOCUMENT RELATES TO) Hon. Dan A. Polster
11 ALL CASES)
12 -----)

13
14
15 HIGHLY CONFIDENTIAL
16 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
17

18 VIDEOTAPED DEPOSITION OF
19 TASHA POLSTER
20 January 23, 2019
21 Chicago, Illinois

22
23 GOLKOW LITIGATION SERVICES
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1 together?

2 A. Yes.

3 Q. And it required a lot of different data
4 pulls to come up to compile the data points in this
5 PowerPoint, right?

6 A. Yes.

7 Q. I'd like to take you to Bates No. 904
8 and it's a section titled "Flagged Orders."

9 A. Okay.

10 Q. And you will see on page 903 it's titled
11 "Flagged Orders," and then you can see the title on
12 904 in the upper right-hand corner "Flagged
13 Orders." Okay?

14 A. Yep.

15 Q. Is "flagged orders" a term that
16 Pharmaceutical Integrity used internally?

17 A. Yes.

18 Q. And what did you use -- what did it
19 mean?

20 A. That was the orders that hit the
21 tolerance or the ceiling and were deemed orders of
22 interest to be reviewed before release.

23 Q. Okay. So, let's walk through Bates
24 No. 904. It says, "Fiscal Year 2014, Fiscal Year

1 2015," correct?

2 A. Yes.

3 Q. And at the bottom is a line graph with
4 the dates October '13 to October '15, approximately
5 a two-year period, correct?

6 A. Yes.

7 Q. And it's titled "Orders Flagged and
8 Canceled Chain-Wide." Okay?

9 A. Okay.

10 Q. Do you see that?

11 A. Yep.

12 Q. Let me make sure I understand.

13 Orders flagged and canceled, are those
14 orders that were flagged on Wayne Bancroft's
15 algorithm and then canceled?

16 A. If the order was generated over what the
17 system -- Wayne's system did, then it was canceled
18 into zero. The orders that were flagged were
19 orders that came in and my team reviewed and, you
20 know, did their due diligence before shipping or
21 reporting to the DEA.

22 Q. So, walk me through some of that. Break
23 that out for me. Okay?

24 So, orders that were I'm going to say

1 identified by Mr. Bancroft's algorithm and reduced
2 to zero, are those flagged orders?

3 A. Those -- those would be the orders
4 exceeded tolerance limit, where it went in, it came
5 over the amount, and we're not going to ship you
6 anything.

7 Q. All right. Let's start on the left-hand
8 side, the pie chart.

9 A. Okay.

10 Q. So, a flagged order is -- and I
11 apologize. I'm just not following you.

12 A flagged order is an order that was
13 identified by Wayne Bancroft's algorithm?

14 A. The flagged orders were the orders that
15 came in that we needed to review. The canceled
16 orders were orders that exceeded the limits and
17 were not shipped at all.

18 Q. Okay. Give me the criteria for a
19 flagged order that were orders that came in that we
20 needed to review?

21 A. They would come in with an override
22 form.

23 Q. What I see here in the left-hand side of
24 this page in the pie chart is the red, 74.16% of